

In the United States District Court

for the EASTERN District of LOUISIANA

United States of America

v.

ZHOU HUA NI

Criminal No. 04-325 "J" (4)

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA  
2005 JUN -1 PM 2:58  
LORETTA G. WHYTE  
CLERK

## Consent to Transfer of Case

for Plea and Sentence

(Under Rule 20)

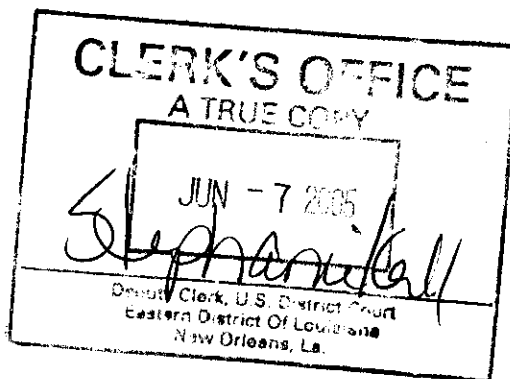
I, ZHOU HUA NI, defendant, have been informed that a indictment ( *indictment, information, complaint* ) is pending against me in the above designated cause. I wish to plead guilty ( *guilty, nolo contendere* ) to the offense charged, to consent to the disposition of the case in the District of Massachusetts in which I am under arrest ( *am under arrest, am held* ) and to waive trial in the above captioned District.

Dated: April 2, 2005 at New Hampton, MI.

ZHOU HUA NI *x* Michael M  
(Defendant)

(Witness)

KEVIN G. MURPHY  
(Counsel for Defendant)



Approved

MICHAEL J. SULLIVAN  
United States Attorney for the

Fee  
✓ Process  
X Paid  
✓ Ct Rm Sup  
Doc. No

JIM LETTEN  
United States Attorney for the

EASTERN

District of

LOUISIANA

District of

MASSACHUSETTS

INTERPRETER, MAG-4, MULTI, TRANSFER

**U. S. District Court**  
**Eastern District of Louisiana (New Orleans)**  
**CRIMINAL DOCKET FOR CASE #: 2:04-cr-00325-CJB-KWR-10**  
**Internal Use Only**

Case title: USA v. Chung, et al

Date Filed: 10/28/2004

Assigned to: Judge Carl J.  
Barbier  
Referred to: Magistrate Judge  
Karen Wells Roby

**Defendant**

**Zhou Hua Ni (10)**  
*TERMINATED: 06/01/2005*

**Pending Counts**

None

**Highest Offense Level**  
**(Opening)**

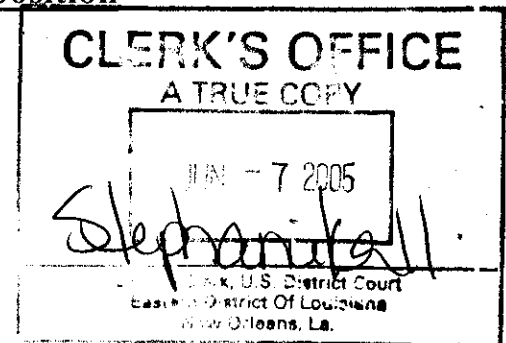
None

**Terminated Counts**

18:371 CONSPIRACY TO  
DEFRAUD THE UNITED  
STATES  
(1)

18:1546(a) FRAUD AND  
MISUSE OF ALIEN  
REGISTRATION RECEIPT

**Disposition**



**Disposition**

transferred 6/1/05

transferred 6/1/05

CARD; 18:2 AIDING &  
ABETTING  
(6)

**Highest Offense Level**  
**(Terminated)**

Felony

**Complaints**

None

**Disposition**

**Plaintiff**

**United States of America**

represented by **Peter Michael Thomson**  
U. S. Attorney's Office  
Hale Boggs Federal Bldg.  
500 Poydras St.  
Room 210  
New Orleans, LA 70130  
504-680-3000  
Email:  
usa-lae-ecf-cr@usdoj.gov  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

<b>Date Filed</b>	<b>#</b>	<b>Docket Text</b>
10/28/2004		MAG FLAG (utility) (sek) (Entered: 11/01/2004)
10/28/2004		Case Sealed. (sek) (Entered: 11/01/2004)
10/28/2004		Docket Modification (Utility) as to defendant Sealed defendant 10 counts added for Sealed defendant 10 (sek) (Entered: 11/01/2004)
10/28/2004		JS2 utility as to all sealed defendants (sek) (Entered: 11/01/2004)

10/28/2004	<u>1</u>	INDICTMENT by USA against Yiu Ming Chung, Li Yun Shang, Zhang Chen, Tak Keung Dicky Chu, Bin Lin, Wei Sheng Lin, Wei Xing Lin, Kong Da Ni, Kong Xiang Ni, Zhou Hua Ni, Xia Yun Shang, Jian Hua Wang, San Ding Zeng & Yong Zheng (seal) (Entered: 02/07/2005)
10/28/2004	<u>2</u>	GRAND JURY RETURN: as to defendant Yiu Ming Chung, defendant Li Yun Shang, defendant Zhang Chen, defendant Tak Keung Dicky Chu, defendant Bin Lin, defendant Wei Sheng Lin, defendant Wei Xing Lin, defendant Kong Da Ni, defendant Kong Xiang Ni, defendant Zhou Hua Ni, defendant Xia Yun Shang, defendant Jian Hua Wang, defendant San Ding Zeng, defendant Yong Zheng; ARREST WARRANT issued for all defendants (seal) (Entered: 02/07/2005)
10/28/2004		(UTILITY) CAPIAS issued for Zhou Hua Ni (seal) (Entered: 02/07/2005)
10/28/2004	<u>3</u>	MOTION and ORDER that indictment is sealed, filed by plaintiff USA as to all defendants, by Magistrate Judge Louis Moore Jr. (seal) (Entered: 02/07/2005)
10/28/2004	<u>4</u>	MOTION and ORDER to unseal indictment, filed by plaintiff USA as to all defendants, by Judge Lance M. Africk (seal) (Entered: 02/07/2005)
02/03/2005		Case unsealed. (seal) (Entered: 02/07/2005)
02/03/2005		Docket Modification (Utility) as to defendant Zhou Hua Ni; to stop XM (sek) (Entered: 02/07/2005)
02/07/2005		Utility event: Bar code printed for [5-1] Scheduling order for appointment of counsel as to Li Yun Shang appointing attorney Virginia Laughlin Schlueter, FPD, [5-2] order (sek) (Entered: 02/07/2005)
02/17/2005		Utility event: Control page printed for [17-1] Scheduling order ; pretrial conference set for 3:00 3/21/05 for Li Yun Shang, for Wei Xing Lin & jury trial set for 8:30 4/11/05 for Li Yun Shang, for Wei Xing Lin, [17-2] hearing notice (pck) (Entered: 02/17/2005)

		02/17/2005)
03/16/2005	<u>68</u>	MOTION to Continue trial & pre-trial conf by United States of America, Wei Xing Lin as to all dfts. (sek, ) (Entered: 03/22/2005)
03/18/2005	62	Sealed Document (sek, ) (Entered: 03/18/2005)
03/21/2005	<u>69</u>	ORDER that mtn to CONTINUE pursuant to Ends of Justice is GRANTED as to all dfts; Jury Trial set for 6/20/2005 08:30 AM before Judge Carl Barbier. Pretrial Conference set for 5/26/2005 10:30 AM before Judge Carl Barbier. Signed by Judge Carl Barbier on 3/21/05. (sek, ) (Entered: 03/22/2005)
03/21/2005		***Motion terminated as to Bin Lin, Tak Keung Dicky Chu, Zhang Chen, Li Yun Shang, Yiu Ming Chung, Wei Sheng Lin, Wei Xing Lin, Kong Da Ni, Kong Xiang Ni, Zhou Hua Ni, Xia Yun Shang, Jian Hua Wang, San Ding Zeng, Yong Zheng: <u>68</u> MOTION to Continue terminated per doc #69 (sek, ) (Entered: 03/22/2005)
03/22/2005	74	Sealed Document (sek, ) (Entered: 03/22/2005)
03/23/2005	76	Sealed Document (sek, ) (Entered: 03/23/2005)
03/30/2005	78	Sealed Document (sek, ) (Entered: 03/30/2005)
04/05/2005	81	Sealed Document (sek, ) (Entered: 04/05/2005)
04/05/2005	82	Sealed Document (sek, ) (Entered: 04/05/2005)
04/21/2005	97	Sealed Document (sek, ) (Entered: 04/22/2005)
04/27/2005	106	Sealed Document (sek, ) (Entered: 04/28/2005)
04/27/2005	107	Sealed Document (sek, ) (Entered: 04/28/2005)
05/09/2005	111	Sealed Document (sek, ) (Entered: 05/09/2005)
05/11/2005	112	Sealed Document (sek, ) (Entered: 05/11/2005)
05/17/2005	114	Sealed Document (sek, ) (Entered: 05/17/2005)

05/20/2005	<u>115</u>	MOTION to Continue trialby United States of America as to all defendants(sek, ) (Entered: 05/20/2005)
05/20/2005	<u>116</u>	ORDER TO CONTINUE - Ends of Justice as to all defendants Jury Trial set for 8/8/2005 08:30 AM before Judge Carl Barbier. Pretrial Conference set for 7/7/2005 03:30 AM before Judge Carl Barbier. Signed by Judge Carl Barbier on 5/20/05. (sek, ) (Entered: 05/20/2005)
05/20/2005		Terminate Deadlines and Hearings as to Bin Lin, Tak Keung Dicky Chu, Zhang Chen, Li Yun Shang, Yiu Ming Chung, Wei Sheng Lin, Wei Xing Lin, Kong Da Ni, Kong Xiang Ni, Zhou Hua Ni, Xia Yun Shang, Jian Hua Wang, San Ding Zeng, Yong Zheng: (sek, ) (Entered: 05/20/2005)
05/20/2005		***Motion terminated as to Bin Lin, Tak Keung Dicky Chu, Zhang Chen, Li Yun Shang, Yiu Ming Chung, Wei Sheng Lin, Wei Xing Lin, Kong Da Ni, Kong Xiang Ni, Zhou Hua Ni, Xia Yun Shang, Jian Hua Wang, San Ding Zeng, Yong Zheng: <u>115</u> MOTION to Continue filed by United States of America; satisfied per doc #116 (sek, ) (Entered: 06/06/2005)
06/01/2005	<u>121</u>	CONSENT TO TRANSFER JURISDICTION (Rule 20) to District of Massachusetts. Counts transferred as to Zhou Hua Ni (10) Count 1,6. (sek, ) (Entered: 06/06/2005)

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA

2004 OCT 28 PM 12:46

LORETTA G. WHYTE  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

INDICTMENT FOR CONSPIRACY TO UNLAWFULLY  
OBTAIN IMMIGRATION DOCUMENTS, FRAUDULENT PROCUREMENT  
OF IMMIGRATION DOCUMENTS, AND PASSPORT FRAUD

UNITED STATES OF AMERICA

v.

YIU MING CHUNG

LI YUN SHANG

a/k/a "Wendy"

ZHANG CHEN

a/k/a "Zheng Chen"

TAK KEUNG DICKY CHU

BIN LIN

WEI SHENG LIN

WEI XING LIN

KONG DA NI

KONG XIANG NI

ZHOU HUA NI

XIA YUN SHANG

JIAN HUA WANG

SAN DING ZENG

YONG ZHENG

a/k/a "Zheng Yong"

CRIMINAL NO.

**04-325 1**

SECTION:

**SECT. J MAG. 4**

VIOLATION: 18 USC § 1546(a)

18 USC § 1542

18 USC § 1425(a)

18 USC § 371

18 USC § 2

\* \* \*

Fee USA  
Process SL  
Dkt'd SL  
CirRmDep 1  
Doc. No. 1

The Grand Jury charges that:

**COUNT 1**

**(CONSPIRACY TO OBTAIN IMMIGRATION DOCUMENTS)**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The United States Immigration and Naturalization Service ("INS"), prior to March 1, 2003, the effective date of the Homeland Security Act, was an agency of the United States charged with the duty and responsibility of enforcing the Immigration and Nationality Act and other such laws relating to immigration, admission, exclusion and deportation.

2. On March 1, 2003, pursuant to the Homeland Security Act, the service functions of the former INS, including the processing and adjudication of petitions for visas and naturalization, and the processing and issuance of alien registration receipt cards, were transferred to the Bureau of Citizenship and Immigration Services ("BCIS") of the United States Department of Homeland Security.

3. On March 1, 2003, pursuant to the Homeland Security Act, the law enforcement investigative functions of the former INS were transferred to the Bureau of Immigration and Customs Enforcement ("BICE") of the United States Department of Homeland Security.

4. An alien is any person not a citizen, national, or naturalized citizen of the United States.



5. A lawful permanent resident is an alien to whom the BCIS, or INS (formerly), has granted permanent resident status. A lawful permanent resident may apply to become a naturalized citizen after meeting statutory requirements.

6. A naturalization certificate is a document issued by the BCIS, or INS (formerly), to a person who is either not born in the United States or to a United States citizen which evidences rights of citizenship that have been granted to that person as if he or she were a native of the United States.

7. An alien registration receipt card is a card issued by the BCIS, or INS (formerly), to a lawful permanent resident which allows the bearer to leave and re-enter the United States and is evidence of authorized stay or employment in the United States. The first such cards to be issued were green in color, and although they have changed in color and design, they are still commonly referred to as “green cards” or “permanent resident cards.”

8. The INS undercover Special Agent (hereinafter referred to as the “undercover agent”) referenced herein represented himself to the defendants as being able to obtain authentic naturalization certificates and alien registration receipt cards from a fictitious corrupt individual employed by the INS.

**B. THE CONSPIRACY:**

From on or about November 3, 1999, and continuing until on or about the date of the return of this indictment, in the Eastern District of Louisiana, the Middle District of Louisiana, and elsewhere, the defendants, **YIU MING CHUNG, ZHANG CHEN, a/k/a “Zheng Chen,” TAK KEUNG DICKY CHU, BIN LIN, WEI SHENG LIN, WEI XING LIN, KONG DA NI, KONG XIANG NI, ZHOU HUA NI, LI YUN SHANG , a/k/a “Wendy,” XIA YUN SHANG, JIAN HUA WANG, SAN DING ZENG, and YONG ZHENG, a/k/a “Zheng Yong,”** did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to knowingly use, attempt to use, possess, obtain, accept, and receive documents prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, knowing the same to be procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

**C. OBJECTS AND PURPOSE OF THE CONSPIRACY:**

Among the objects and purposes of the conspiracy were to illegally purchase, possess, sell, and dispose of alien registration receipt cards (green cards) and naturalization certificates to and by persons not authorized by law to receive such official documents.

**D. ROLES IN THE CONSPIRACY:**

1. The defendant, **YIU MING CHUNG**, in addition to fraudulently purchasing a naturalization certificate on his own behalf, served as a broker for Chinese nationals and aliens unlawfully in the United States who sought to fraudulently purchase and obtain United States permanent resident alien cards and/or naturalization certificates.

2. The defendant, **LI YUN SHANG, a/k/a "Wendy,"** served as a broker for Chinese nationals and aliens unlawfully in the United States who sought to fraudulently purchase and obtain United States permanent resident alien cards and/or naturalization certificates.

**E. OVERT ACTS:**

In furtherance of the conspiracy and to accomplish the purposes thereof, the defendants named below committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. On or about November 3, 1999, **YIU MING CHUNG** telephonically paged the undercover agent to call telephone number (504) 223-1333, which the undercover agent dialed and **CHUNG** answered.

2. On or about November 5, 1999, **YIU MING CHUNG** met with the undercover agent in Boutte, Louisiana inside the agent's Chevrolet Tahoe motor vehicle. **CHUNG** arranged for defendant **JIAN HUA WANG**, an associate of his who is a citizen of China and an illegal alien in the United States, to fraudulently obtain a genuine United States "green card" from the undercover agent for the price of \$25,000.00 U.S. currency.

3. On or about November 27, 1999, **YIU MING CHUNG** met with the undercover agent in Boutte, Louisiana. **CHUNG** signed documents in furtherance of obtaining a genuine "naturalization certificate" from the undercover agent.

4. On or about November 27, 1999, **JIAN HUA WANG** met with the undercover agent in Boutte, Louisiana. **WANG** provided his fingerprints to the Undercover agent for the purpose of fraudulently obtaining a genuine United States "green card" and signed documents presented by the undercover agent for the same purpose.

5. On or about January 18, 2000, **YIU MING CHUNG** and **JIAN HUA WANG** met with the undercover agent in Boutte, Louisiana at which time **WANG** took possession of a genuine United States "green card" in his name.

6. On or about January 18, 2000, **YIU MING CHUNG** handed the undercover agent a sum of U.S. currency for the genuine United States "green card" in **WANG'S** name.

7. On or about April 8, 2000, **YIU MING CHUNG** and **WEI SHENG LIN** met with the undercover agent in Boutte, Louisiana. At that time **LIN** provided his fingerprints to the undercover agent for the purpose of fraudulently obtaining a genuine United States "naturalization certificate."

8. On or about May 15, 2000, **WEI SHENG LIN** met with the undercover agent in Boutte, Louisiana and took possession of a genuine "naturalization certificate."

9. On or about July 21, 2000, **YIU MING CHUNG** and **SAN DING ZENG** met with the undercover agent in Boutte, Louisiana. **ZENG** provided his fingerprints to the undercover agent for the purpose of fraudulently obtaining a genuine United States "green card" and signed documents presented by the undercover for the same purpose.

10. On or about July 31, 2000, **WEI XING LIN** and **ZHOU HUA NI**, together with **YIU MING CHUNG**, met with the undercover agent in Boutte, Louisiana and provided information for the purpose of fraudulently obtaining genuine United States "green cards."

11. On or about August 27, 2000, **WEI XING LIN**, together with other co-conspirators known to the Grand Jury, met with the undercover agent in Baton Rouge, Louisiana and discussed obtaining a genuine United States "green card" for **LIN**.
12. On or about October 11, 2000, **WEI XING LIN** and **LI YUN SHANG**, a/k/a "**Wendy**," met with the undercover agent in Houma, Louisiana and discussed the purchase of "green cards."
13. On or about October 13, 2000, **WEI XING LIN** deposited or caused to be deposited by wire transfer approximately \$5,000.31 into an undercover bank account maintained by the U.S. Government at Bank One in New Orleans, Louisiana.
14. On or about October 17, 2000, **WEI XING LIN** and **LI YUN SHANG**, a/k/a "**Wendy**," together with **YONG ZHENG**, met with the undercover agent in Houma, Louisiana at which time **LIN** took possession of a genuine United States "green card" in his name.
15. On or about October 30, 2000, **WEI XING LIN**, **ZHOU HUA NI**, **LI YUN SHANG**, a/k/a "**Wendy**," and **YONG ZHENG** met with the undercover agent in Houma, Louisiana. At that time, **LIN** and **NI** took possession of genuine United States "green cards" printed in their names.
16. On or about December 26, 2000, **XIA YUN SHANG** met with the undercover agent in Houma, Louisiana and provided fingerprints of herself and signed forms for the purpose of obtaining a genuine United States "green card."
17. On or about February 15, 2001, **KONG DA NI** deposited or caused to be deposited by wire transfer approximately \$9,000.14 into an undercover bank account maintained by the U.S. Government at Bank One in New Orleans, Louisiana.
18. On or about February 23, 2001, **KONG DA NI** met with the undercover agent in Houma, Louisiana and took possession of a genuine United States "green card" in his name.

19. On or about February 23, 2001, **BIN LIN** met with the undercover agent in Houma, Louisiana and took possession of a genuine United States "green card" in his name.

20. On or about February 23, 2001, **KONG XIANG NI** met with the undercover agent in Houma, Louisiana and took possession of a genuine United States "green card" in his name.

21. On or about February 23, 2001, **ZHANG CHEN** met with the undercover agent in Houma, Louisiana and took possession of a genuine United States "green card" in his name.

22. On or about March 8, 2001, **SAN DING ZENG** and **YIU MING CHUNG** met with the undercover agent in Boutte, Louisiana. The purpose of the meeting was, in part, to acquire additional information for the purpose of processing **ZENG** for a genuine "green card" that he sought to obtain.

23. On or about May 1, 2001, **SAN DING ZENG** met with the undercover agent in Boutte, Louisiana and took possession of a genuine United States "green card" in his name.

24. On or about May 7, 2001, **YIU MING CHUNG** deposited or caused to be deposited by wire transfer approximately \$8,333.97 into an undercover U.S. Government bank account maintained in the Cayman Islands with Scotia Bank, Ltd.

25. On or about May 9, 2001, **YIU MING CHUNG** deposited or caused to be deposited by wire transfer approximately \$8,315.97 into an undercover U.S. Government bank account maintained in the Cayman Islands with Scotia Bank, Ltd.

26. On or about May 11, 2001, **YIU MING CHUNG** deposited or caused to be deposited by wire transfer approximately \$8,332.97 into an undercover U.S. Government bank account maintained in the Cayman Islands with Scotia Bank, Ltd.

27. On or about June 4, 2001, **TAK KEUNG DICKY CHU** and **YIU MING CHUNG** met with the undercover agent in Houma, Louisiana at which time **CHU** provided fingerprints of himself and signed forms for the purpose of obtaining a genuine United States “green card.”

28. On or about August 1, 2001, **LI YUN SHANG**, a/k/a “Wendy,” met with the undercover agent in Houma, Louisiana and discussed the purchase of additional genuine United States “green cards” on behalf of other individuals seeking false immigration documents.

All in violation of Title 18, United States Code, Section 371.

**(FRAUDULENT PROCUREMENT OF NATURALIZATION CERTIFICATES)**

**COUNT 2**

From on or about November 27, 1999 to on or about April 8, 2000, in the Eastern District of Louisiana, and elsewhere, the defendant, **YIU MING CHUNG**, did knowingly and intentionally procure and attempt to procure, contrary to law, the naturalization of any person and documentary and other evidence of naturalization and of citizenship, that is, a “naturalization certificate” in the defendant’s name, for which the defendant paid an undercover Special Agent with the Immigration and Naturalization Service the sum of ten thousand dollars (\$10,000.00); all in violation of Title 18, United States Code, Section 1425(a).

**COUNT 3**

From on or about April 8, 2000 to on or about May 15, 2000, in the Eastern District of Louisiana, and elsewhere, the defendants, **YIU MING CHUNG** and **WEI**

**SHENG LIN**, did knowingly and intentionally procure and attempt to procure, contrary to law, the naturalization of any person and documentary and other evidence of naturalization and of citizenship, that is, a “naturalization certificate” in the name of the defendant, **WEI SHENG LIN**, for which the defendants paid an undercover Special Agent of the Immigration and Naturalization Service the sum of ten thousand dollars (\$10,000.00); all in violation of Title 18, United States Code, Sections 1425(a) and 2.

**(FRAUDULENT PROCUREMENT OF ALIEN REGISTRATION RECEIPT CARDS)**

**COUNT 4**

On or about January 18, 2000, in the Eastern District of Louisiana, and elsewhere, the defendants, **YIU MING CHUNG** and **JIAN HUA WANG**, did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 5**

From on or about October 17, 2000 to on or about October 30, 2000, in the Eastern District of Louisiana, and elsewhere, the defendants, **LI YUN SHANG**, a/k/a “Wendy” and **WEI XING LIN**, did knowingly and intentionally possess, obtain, accept, and



receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

#### **COUNT 6**

On or about October 30, 2000, in the Eastern District of Louisiana, and elsewhere, the defendants, **LI YUN SHANG, a/k/a “Wendy”** and **ZHOU HUA NI**, did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

#### **COUNT 7**

On or about January 2, 2001, in the Eastern District of Louisiana, and elsewhere, the defendants, **LI YUN SHANG, a/k/a “Wendy”** and **YONG ZHENG, a/k/a “Zheng Yong,”** did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover

Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 8**

On or about February 23, 2001, in the Eastern District of Louisiana, and elsewhere, the defendants, **LI YUN SHANG, a/k/a “Wendy”** and **KONG XIANG NI**, did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 9**

On or about February 23, 2001, in the Eastern District of Louisiana, and elsewhere, the defendants, **LI YUN SHANG, a/k/a “Wendy”** and **BIN LIN**, did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the

immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 10**

On or about February 23, 2001, in the Eastern District of Louisiana, and elsewhere, the defendants, **LI YUN SHANG, a/k/a “Wendy”** and **ZHANG CHEN, a/k/a “Zheng Chen,”** did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 11**

On or about February 23, 2001, in the Eastern District of Louisiana, and elsewhere, the defendants, **LI YUN SHANG, a/k/a “Wendy”** and **KONG DA NI,** did knowingly and intentionally use, attempt to use, possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States

currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 12**

On or about February 23, 2001, in the Eastern District of Louisiana, and elsewhere, the defendant, **LI YUN SHANG, a/k/a "Wendy,"** did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card in the name of "Xia Yun Shang," which the defendant, **LI YUN SHANG, a/k/a "Wendy,"** knew to be procured by fraud and unlawfully obtained; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 13**

On or about March 23, 2001, in the Eastern District of Louisiana, and elsewhere, the defendant, **LI YUN SHANG, a/k/a "Wendy,"** did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card in the name of "Yong Zheng," which the defendant, **LI YUN SHANG, a/k/a "Wendy,"** knew to be procured by fraud and unlawfully obtained; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 14**

On or about May 1, 2001, in the Eastern District of Louisiana, and elsewhere, the defendants, **YIU MING CHUNG** and **SAN DING ZENG,** did knowingly and

intentionally possess, obtain, accept, and receive an alien registration receipt card, which the defendants knew to be procured by fraud and unlawfully obtained, in that the defendants paid and caused to be paid to an undercover Special Agent of the Immigration and Naturalization Service a sum of United States currency for receipt of the immigration document; all in violation of Title 18, United States Code, Sections 1546(a) and 2.

**COUNT 15**

On or about July 10, 2001, in the Eastern District of Louisiana, and elsewhere, the defendant, **YIU MING CHUNG**, did knowingly and intentionally possess, obtain, accept, and receive an alien registration receipt card in the name of "Tak Keung Dicky Chu," which the defendant, **YIU MING CHUNG**, knew to be procured by fraud and unlawfully obtained; all in violation of Title 18, United States Code, Sections 1546(a) and 2.


**(PASSPORT FRAUD)**

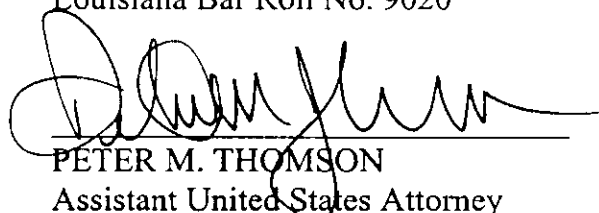
**COUNT 16**

On or about June 21, 2000, in the Eastern District of Louisiana, and elsewhere, the defendant, **YIU MING CHUNG**, did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that applying

for said passport the defendant represented his possession of a lawfully issued naturalization certificate, that is, Certificate of Naturalization Number 24190054, purportedly issued by the Commissioner of Immigration and Naturalization on December 9, 1999, which statement and representation he knew to be false; all in violation of Title 18, United States Code, Section 1542.

  
JIM LETTEN  
United States Attorney  
Louisiana Bar Roll No. 8517

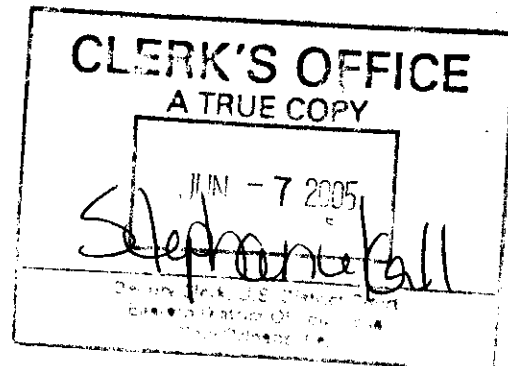
  
JAN MASELLI MANN  
First Assistant United States Attorney  
Chief, Criminal Division  
Louisiana Bar Roll No. 9020

  
PETER M. THOMSON  
Assistant United States Attorney  
Louisiana Bar Roll No. 2147

New Orleans, Louisiana  
October 28, 2004

A TRUE BILL:

  
FOREPERSON



NDM 080-34  
APR. 91

N<sub>0</sub>

UNITED STATES DISTRICT COURT

EASTERN District of LOUISIANA

Division

THE UNITED STATES OF AMERICA

YIU MING CHUNG, ZHANG CHEN a/k/a "Zheng Chen",  
TAK KEUNG DICKY CHU, BIN LIN, WEI SHENG LIN,  
WEI XING LIN, KONG DA NI, KONG XIANG NI, ZHOU HUA NI,  
LI YUN SHANG a/k/a "Wendy", XIA YUN SHANG, JIAN HUA WANG,  
SAN DING ZENG, YONG ZHENG a/k/a "Zheng Yong"

INDICTMENT

INDICTMENT FOR CONSPIRACY TO UNLAWFULLY OBTAIN IMMIGRATION  
DOCUMENTS, FRAUDULENT PROCUREMENT OF IMMIGRATION DOCUMENTS, AND PASSPORT FRAUD  
VIOLATION:

18 U.S.C. §1546(a); 18 U.S.C. §1542;  
18 U.S.C. §1425(a)  
18 U.S.C. §371  
18 U.S.C. §2

A true bill.

Foreman

Filed in open court this day,

of A.D. 19

Clerk

Bail, \$

PETER M. THOMSON

Assistant United States Attorney

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

GRAND JURY RETURN

DATE: OCTOBER 28, 2004

SECTION: MAGISTRATE JUDGE LOUIS MOORE, JR.

ASSIGNED CRIMINAL NO.: \_\_\_\_\_  
ASSIGNED SECTION: \_\_\_\_\_

UNITED STATES OF AMERICA  
VERSUS

YIU MING CHUNG, ET AL

**04-325**

**SECT. J MAG. 4**

PETER THOMSON, Assistant United States Attorney

On the motion of the Assistant U.S. Attorney, PETER THOMSON LET THE SUPERSEDING INDICTMENT, NO. \_\_\_\_, FOLLOW THE ALLOTMENT OF THE FORMER INDICTMENT, WHICH WAS ALLOTTED TO SECTION \_\_.

IT IS ORDERED that:

Bond be set at \$ \_\_\_\_\_

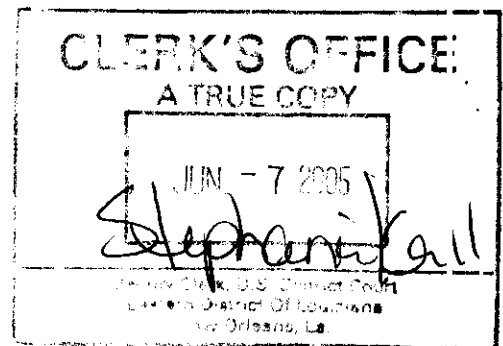
The Bond previously set is approved.

Summons issue for \_\_\_\_\_

CAPIAS issue for ALL DEFENDANTS

No Action Necessary except NOTICE \_\_\_\_

Arraignment is set for \_\_\_\_\_



Fee \_\_\_\_\_  
Process \_\_\_\_\_  
Dkt'd \_\_\_\_\_  
ClRmDep \_\_\_\_\_  
Doc. No. 2

*st (re: capics.)*



FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

2004 OCT 28 PI

LORETTA G. WHYTE  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

v.

YIU MING CHUNG  
ZHANG CHEN  
a/k/a "Zheng Chen"  
TAK KEUNG DICKY CHU  
BIN LIN  
WEI SHENG LIN  
WEI XING LIN  
KONG DA NI  
KONG XIANG NI  
ZHOU HUA NI  
LI YUN SHANG  
a/k/a "Wendy"  
XIA YUN SHANG  
JIAN HUA WANG  
SAN DING ZENG  
YONG ZHENG  
a/k/a "Zheng Yong"

CRIMINAL NO.

04-3257

SECTION:

SECT. J MAG. 4

VIOLATION: 18 USC § 1546(a)  
18 USC § 1542  
18 USC § 1425(a)  
18 USC § 371  
18 USC § 2

\* \* \*

MOTION AND INCORPORATED  
MEMORANDUM TO SEAL INDICTMENT

NOW INTO COURT comes the United States of America, appearing herein by and  
through the undersigned Assistant United States Attorney, and moves this Court for an order,

DATE OF ENTRY

FEB - 7 2005

Fee \_\_\_\_\_  
Process \_\_\_\_\_  
X Dep \_\_\_\_\_  
CtRmDep \_\_\_\_\_  
Doc. No. \_\_\_\_\_

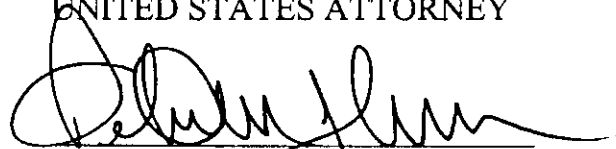
pursuant to Rule 6(e)(4) of the Federal Rules of Criminal Procedure, directing the Clerk of Court for the Eastern District of Louisiana to seal the indictment in the above captioned case, together with this Motion and Order to Seal, for the following reasons:

Publication of the indictment at this time would likely compromise the government's ability to locate and arrest all of the defendants charged, a portion of whom are believed to be illegally in this country and located outside the state of Louisiana. Pursuant to Rule 6(e)(4) of the Federal Rules of Criminal Procedure, a federal magistrate judge may direct that an indictment be kept secret until the defendants are in custody or have been released pending trial.

**WHEREFORE**, for the foregoing reasons, the government prays for an order directing the Clerk of Court, Eastern District of Louisiana, to seal the indictment in the above captioned case together with this Motion and Order to Seal. The government requests that, prior to sealing, a certified copy of the indictment be provided to the United States Attorney's Office for the Eastern District of Louisiana.

Respectfully submitted,

JIM LETTEN  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Peter M. Thomson', is written over a horizontal line.

PETER M. THOMSON  
Assistant United States Attorney  
LA Bar Roll Number 2147  
Hale Boggs Federal Building  
500 Poydras Street, Room 210  
New Orleans, Louisiana 70130  
Telephone: (504) 680-3023

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
YIU MING CHUNG	*	VIOLATION: 18 USC § 1546(a)
ZHANG CHEN		18 USC § 1542
a/k/a "Zheng Chen"	*	18 USC § 1425(a)
TAK KEUNG DICKY CHU		18 USC § 371
BIN LIN	*	18 USC § 2
WEI SHENG LIN		
WEI XING LIN	*	
KONG DA NI		
KONG XIANG NI	*	
ZHOU HUA NI		
LI YUN SHANG	*	
a/k/a "Wendy"		
XIA YUN SHANG	*	
JIAN HUA WANG		
SAN DING ZENG	*	
YONG ZHENG		
a/k/a "Zheng Yong"	*	

\* \* \*

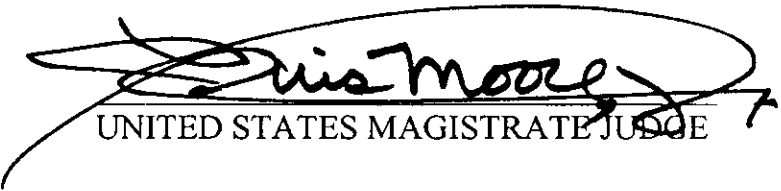
ORDER

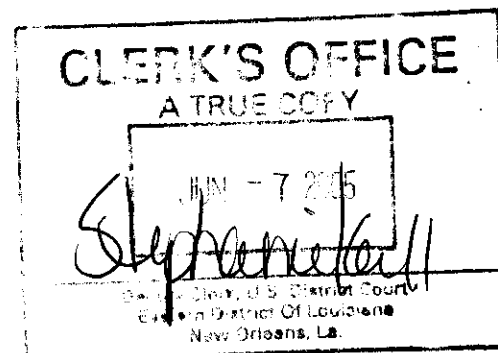
Considering the foregoing motion:

**IT IS HEREBY ORDERED** that the Clerk of Court for the Eastern District of

Louisiana seal the indictment in the above captioned matter, together with the government's motion and this order, after providing the United States Attorney's Office, Eastern District of Louisiana, a certified copy of the indictment;

New Orleans, Louisiana this October day of October, 2004.

  
UNITED STATES MAGISTRATE JUDGE



FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA

2005 FEB -3 AM 9:09

LORI LIA G. WHYTE  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 04-325

v. \* SECTION: "J" (4)

YIU MING CHUNG \*

LI YUN SHANG \*

a/k/a "Wendy" \*

ZHANG CHEN \*

a/k/a "Zheng Chen" \*

TAK KEUNG DICKY CHU \*

BIN LIN \*

WEI SHENG LIN \*

WEI XING LIN \*

KONG DA NI \*

KONG XIANG NI \*

ZHOU HUA NI \*

XIA YUN SHANG \*

JIAN HUA WANG \*

SAN DING ZENG \*

YONG ZHENG \*

a/k/a "Zheng Yong" \*

\* \* \*

MOTION TO UNSEAL INDICTMENT

NOW INTO COURT, comes the United States of America, appearing herein through  
the undersigned Assistant United States Attorney, and moves this Honorable Court for an

DATE OF ENTRY

FEB - 7 2005

Fee \_\_\_\_\_  
Process \_\_\_\_\_  
X Dktd \_\_\_\_\_  
CtRmDep \_\_\_\_\_  
Doc. No \_\_\_\_\_

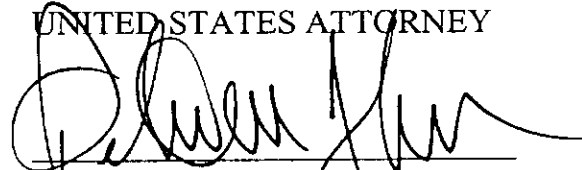
order unsealing the indictment in the above-captioned case for the foregoing reason:

One or more defendants have been arrested and, accordingly, it is not necessary for the indictment to remain sealed.

**WHEREFORE**, for the foregoing reasons, the government prays for an order unsealing the indictment in this matter.

Respectfully submitted,

JIM LETTEN  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Peter M. Thomson', is written over a horizontal line.

PETER M. THOMSON  
Assistant United States Attorney  
LA Bar Roll Number 2147  
Hale Boggs Federal Building  
500 Poydras Street, Room 210  
New Orleans, Louisiana 70130  
Telephone: (504) 680-3023

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA                   \*           CRIMINAL NO.   04-325**  
  
**\*           SECTION:           “J” (4)**

**YIU MING CHUNG                               \***  
**LI YUN SHANG                                 \***  
**a/k/a “Wendy”                       \***  
**ZHANG CHEN                                 \***  
**a/k/a “Zheng Chen”               \***  
**TAK KEUNG DICKY CHU                     \***  
**BIN LIN                                       \***  
**WEI SHENG LIN                               \***  
**WEI XING LIN                                \***  
**KONG DA NI                                  \***  
**KONG XIANG NI                              \***  
**ZHOU HUA NI                                \***  
**XIA YUN SHANG                              \***  
**JIAN HUA WANG                             \***  
**SAN DING ZENG                              \***  
**YONG ZHENG                                 \***  
**a/k/a “Zheng Yong”               \***

**\*           \*           \***

**ORDER**

Considering the foregoing motion;

**IT IS HEREBY ORDERED** that the Clerk of Court for the Eastern District of

Louisiana unseal the indictment in the above captioned matter.

New Orleans, Louisiana this 3 day of February, 2005.

  
UNITED STATES DISTRICT JUDGE

